

Hensley, Amy

From: Hensley, Amy
Sent: Tuesday, March 26, 2013 11:28 AM
To: 'Cassell, Rex L DLA CIV INSTALLATION SUPPORT'
Subject: RE: PCB certificate of destruction

Mr. Cassell,

I asked some EPA regional staff and it seems that this is an acceptable industry practice for some types of PCB waste and disposal. The facility bulking the wastes must keep track of who's waste went into what batch and should send the original generators certificates of disposal. If you have questions or concerns about your specific situation, I recommend that you contact your regional PCB coordinator. They are very knowledgeable about industry practices and whether or not they meet the regulatory requirements. You can find the list of coordinators at this website - <http://www.epa.gov/epawaste/hazard/tsd/pcbs/pubs/coordin.htm>

I hope this helps.

Amy

Amy Hensley
Cleanup Programs Branch
Office of Resource Conservation & Recovery
US EPA
703-305-5084

From: Cassell, Rex L DLA CIV INSTALLATION SUPPORT [<mailto:Rex.Cassell@dla.mil>]
Sent: Tuesday, February 26, 2013 11:34 AM
To: Hensley, Amy
Subject: PCB certificate of destruction

My current waste disposal contractor manifests PCB waste from my facility to their TSDF. They then bulk it together with other PCB waste and send it out on another manifest to the ultimate disposal facility. When I get the certificate of disposal back it is made out to my waste contractor since they are who is listed on the manifest as the generator. The regulation states it is to be made out to the generator. In which case I would be the original generator. When I question them on this, I am told this is the industry standard. Is what they are providing me within the regulatory requirements?